

1 **LOREN S. YOUNG, ESQ.**

Nevada Bar No. 7567

2 **CAROLINE ROSKE REILLY, ESQ.**

Nevada Bar No. 13236

3 **LINCOLN, GUSTAFSON & CERCOS, LLP**

*ATTORNEYS AT LAW*

4 3960 Howard Hughes Parkway, Suite 200

Las Vegas, Nevada 89169

5 Telephone: (702) 257-1997

Facsimile: (702) 257-2203

6 lyoung@lgclawoffice.com

7 Attorneys for Defendant, TARGET CORPORATION

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10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 VICKI MARTINEZ, an individual,

13 Plaintiff,

14 v.

15 TARGET STORE NO. 2404, an unknown entity;  
16 TARGET CORPORATION, a Foreign  
17 Corporation; DOES I-V; and ROE  
18 CORPORATIONS VI-X, inclusive,

Defendants.

CASE NO.: 2:20-cv-02159-GMN-DJA

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES  
(FIRST REQUEST)**

19 Plaintiff, VICKI MARTINEZ, by and through her counsel of record, Craig W. Drummond,  
20 Esq. and Liberty A. Ringor, Esq. of the law firm of DRUMMOND LAW FIRM, P.C., and Defendant,  
21 TARGET CORPORATION (“Defendant”), by and through its counsel of record, LOREN S. YOUNG,  
22 ESQ. and CAROLINE ROSKE REILLY, ESQ., of the law firm LINCOLN, GUSTAFSON &  
23 CERCOS, LLP, hereby stipulate and request that the Court extend the expert disclosures and the  
24 remaining discovery and dispositive motion deadlines by approximately sixty (60) days. This  
25 extension is not sought for the purpose of delay or for any other untoward purpose. This stipulation  
26 is based on the fact that additional time is necessary to conduct discovery; the majority of which relates  
27 to the COVID-19 directives. This is the parties’ first request to extend any discovery and dispositive  
28 motion deadlines in this matter.

Pursuant to Local Rule 26-3, the parties state as follows:

**I. DISCOVERY COMPLETED TO DATE**

- a. The parties conducted the Fed. R. Civ. P. 26(f) conference on December 16, 2020;
- b. The parties have exchanged initial disclosures of documents and lists of witnesses; and
- c. Defendant has propounded requests for production of documents and interrogatories on Plaintiff, with responses currently due February 11, 2021.

**II. DISCOVERY TO BE COMPLETED**

- a. Written discovery requests between the parties;
- b. Obtain and disclose medical records/billing for Plaintiff;
- c. Deposition of Plaintiff, Vicki Martinez;
- d. Deposition of Target Corporation's 30(b)(6) witness;
- e. Depositions of Target employees;
- f. Depositions of fact witnesses;
- g. F.R.C.P. 35 examination of Plaintiff;
- h. Disclosure of expert witnesses;
- i. Depositions of Plaintiff's treating physicians;
- j. Depositions of Plaintiff's experts; and
- k. Depositions of Defendant's experts.

The above list is made without prejudice to the parties' ability to conduct additional discovery consistent with the Federal Rules of Civil Procedure.

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**III. REASONS WHY THE DEADLINES CANNOT BE COMPLETED WITHIN THE  
CURRENT SCHEDULE**

This matter is a personal injury claim, where the Plaintiff is alleging injuries due to a slip and fall on the premises of Defendant in Las Vegas, Nevada. Currently, Plaintiff is claiming past and future medical and other damages. The parties have been participating in the discovery process, however, there is pertinent discovery that remains to be completed.

Additionally, the COVID-19 pandemic has caused scheduling issues that have and may possibly continue to result in delays. Plaintiff is still treating and as such, the parties will need additional time to evaluate said treatment. Defendant will be obtaining Plaintiff's past medical records upon receipt of executed HIPAAs. Until such time that Defendant has received Plaintiff's complete medical records, Defendant's experts cannot conduct a medical records review, perform an F.R.C.P. 35 examination, and attendant expert reports. Consequently, additional time is necessary in order to complete the expert disclosures and remaining discovery. The parties agree that this request is not made for the purpose of delay, but to ensure a just adjudication of the case on the merits, and that neither party will be prejudiced by the requested extension. The parties will continue to work cooperatively with each other to complete discovery.

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**IV. SCHEDULE**

WHEREFORE, the parties respectfully request that this Court extend discovery deadlines as follows:

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Discovery Deadline	July 6, 2021	September 6, 2021
Last Day to Amend Pleadings/Add Parties	April 7, 2021	June 7, 2021
Initial Expert Disclosure	May 7, 2021	July 6, 2021
Rebuttal Expert Disclosure	June 4, 2021	August 3, 2021
Dispositive Motions	August 5, 2021	October 4, 2021
Pretrial Order	September 3, 2021	November 2, 2021

DATED this 29<sup>th</sup> day of January, 2021.

**DRUMMOND LAW FIRM, P.C.**

*/s/ Craig W. Drummond*

CRAIG W. DRUMMOND, ESQ.

Nevada Bar No. 11109

LIBERTY A. RINGOR, ESQ.

Nevada Bar No. 14417

810 S. Casino Center Blvd., Ste.191

Las Vegas, Nevada 89101

*Attorneys for Plaintiff*

DATED this 29<sup>th</sup> day of January, 2021.

**LINCOLN, GUSTAFSON & CERCOS, LLP**

*/s/ Caroline Roske Reilly*

LOREN S. YOUNG, ESQ.

Nevada Bar No. 7567

CAROLINE ROSKE REILLY, ESQ.

Nevada Bar No. 13236

3960 Howard Hughes Parkway, Suite 200

Las Vegas, NV 89169

*Attorneys for Defendant*

IT IS SO ORDERED



UNITED STATES MAGISTRATE JUDGE


DATED: February 1, 2021

**Vicki Martinez v. Target Corporation, et al.**  
**Clark County Case No. 2:20-cv-02159-GMN-DJA**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 29<sup>th</sup> day of January, 2021, I served a copy of the attached  
**STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES (FIRST  
REQUEST)** to be served via US Mail to the last known address to all parties on the service list as  
follows:

Craig W. Drummond, Esq.  
Liberty A. Ringor, Esq.  
DRUMMOND LAW FIRM, P.C.  
810 S. Casino Center Blvd., Ste. 101  
Las Vegas, NV 89101  
[craig@drummondfirm.com](mailto:craig@drummondfirm.com)  
[liberty@drummondfirm.com](mailto:liberty@drummondfirm.com)  
Attorneys for Plaintiff

  
Carmen A. Cherry, an employee  
of the law offices of  
Lincoln, Gustafson & Cercos, LLP

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